

Case Name: Watson v. NYC, et al. Case Number: 23-CV-08975 (LDH) (TAM)

CASE MANAGEMENT WORKSHEET			
<u>Preparation for Initial Conference</u>			
Rule 26(f) conference held?		Date: 4/5/2024	
Deadline for Rule 26(a) initial disclosures and any HIPAA-compliant records authorizations:		4/15/2024	
Procedures discussed for producing Electronically Stored Information (ESI)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A
Confidentiality Order to be submitted for Court approval?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A
Anticipated number of depositions:	Plaintiff(s): 5-10 Defendant(s): 1-3		
First requests for production of documents and for interrogatories due by:	5/14/2024		
<u>Proposed Deadlines for Pre-Settlement Discovery (Phase I)</u>			
Agreed upon completion date for Phase I Discovery: (Reciprocal agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)		1/7/2025	
Date for pre-settlement status conference with counsel: (Proposed date to report the parties' preparedness for mediation or a settlement conference. Presumptively 10-15 days after the completion of Phase I Discovery.)		1/22/2025	
<u>Proposed Deadlines for Discovery and Motion Practice (Phase II)</u>			
Deadline to join new parties or amend pleadings as of right: (Presumptively 15 days after initial settlement conference)		3/3/2025	
All fact discovery completed by: (Presumptively 3.5 months after first requests for documents/interrogatories)		5/15/2025	
Joint status report certifying close of fact discovery:		6/5/2025	
Anticipated number of expert reports:	Plaintiff(s): 1 Defendant(s): 1		

Exchange of expert disclosures completed by: (Presumptively 30 days after fact discovery)	6/17/2025	
Expert depositions completed by: (Presumptively 30 days after initial expert disclosures)	7/17/2025	
Exchange of rebuttal expert reports by: (Presumptively 30–45 days after initial expert disclosures)	9/12/2025	
All expert discovery completed by:	10/14/2025	
CERTIFICATION OF THE COMPLETION OF ALL DISCOVERY BY: (Presumptively 9 months after Initial Conference)	11/4/2025	
Final date to take first step in dispositive motion practice: (Parties are directed to consult the District Judge's Individual Rules regarding such motion practice. Presumptively 30 days after completion of all discovery.)	12/10/2025	
Do the parties wish to be referred to EDNY's mediation program pursuant to Local Rule 83.8?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Do the parties consent to trial before a Magistrate Judge pursuant to 28 U.S.C. § 636(c)? (The fillable consent form may be found at https://www.uscourts.gov/forms/civil-forms/notice-consent-and-reference-civil-action-magistrate-judge . Consenting does not affect a party's right to a jury trial.)	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

SO ORDERED:

TARYN A. MERKL
United States Magistrate Judge

DATE